



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

MKP/TH
F. #2017R01840

*271 Cadman Plaza East
Brooklyn, New York 11201*

April 12, 2018

By ECF

The Honorable Steven L. Tiscione
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Keith Raniere
Docket No.: 18-M-132

Dear Judge Tiscione:

The defendant Keith Raniere is scheduled to appear before the Court tomorrow at 2:00 p.m. for arraignment. Enclosed is a copy of the letter the government initially submitted on March 26, 2018 to the Honorable Steven M. Gold, United States Magistrate Judge, in anticipation of the defendant's expected removal from the Northern District of Texas to the Eastern District of New York.

For the reasons set forth in that letter, the government submits that there is no condition or combination of conditions that will adequately assure the safety of the community, the defendant's return to Court, the defendant's compliance with the Court's directives or the

integrity of the trial process. Therefore, the government respectfully requests that the defendant be permanently detained pending trial.

Respectfully submitted,

RICHARD P. DONOGHUE
United States Attorney

By: /s/
Moir Kim Penza
Tanya Hajjar
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(718) 254-7000

Enclosure

cc: Paul DerOhannesian, Esq.